

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAMONT DAVIS, NAKA BLOUNT, and	)	
SHAMIKKAH SLAUGHTER, on behalf	)	
of themselves and all other persons	)	Case No. 1:19-cv-00680
similarly situated, known and unknown,	)	
	)	Judge Valderrama
Plaintiffs,	)	
	)	
v.	)	
	)	
HEARTLAND EMPLOYMENT SERVICES,	)	
LLC,	)	
	)	
Defendant.	)	

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE MEMORANDUM OF  
LAW NOT TO EXCEED TWENTY PAGES IN SUPPORT OF THEIR FORTHCOMING  
UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT**

Plaintiffs will soon file their Unopposed Motion for Preliminary Approval of Class Action Settlement. Plaintiffs' Memorandum of Law in support of that Motion will exceed the 15-page limit set by Local Rule 7.1. Plaintiffs expect their Memorandum of Law to be 18 pages. The extra pages are necessary for Plaintiffs to analyze all of the relevant legal and factual issues that support preliminary approval of their class action settlement. As a result, Plaintiffs request leave to file a Memorandum of Law not to exceed 20 pages.

Defendant does not oppose the relief requested by this Motion.

WHEREFORE, Plaintiffs request leave to file a Memorandum of Law not to exceed 20 pages in support of their forthcoming Unopposed Motion for Preliminary Approval of Class Action Settlement.

Dated: March 10, 2021

Respectfully submitted,

/s/Zachary C. Flowerree  
*One of Plaintiff's Attorneys*

Douglas M. Werman  
dwerman@flsalaw.com  
Zachary C. Flowerree  
zflowerree@flsalaw.com  
Werman Salas P.C.  
77 W. Washington, Suite 1402  
Chicago, IL 60602  
(312) 419-1008

David Fish  
dfish@fishlawfirm.com  
Mara Baltabols  
mara@fishlawfirm.com  
The Fish Law Firm, P.C.  
200 East 5th Avenue, Suite 123  
Naperville, IL 60563  
(630) 355-7590

*Attorneys for Plaintiffs and  
Others Similarly Situated*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing was filed with the Court's CM/ECF filing system on March 10, 2021, which will serve a copy on all counsel of record.

/s/ Zachary C. Flowerree  
*One of the Attorneys for Plaintiffs*